

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BALTIMORE DIVISION

JASON ALFORD, DANIEL LOPER, WILLIS
McGAHEE, MICHAEL McKENZIE, JAMIZE
OLAWALE, ALEX PARSONS, ERIC SMITH,
CHARLES SIMS, JOEY THOMAS, and LANCE
ZENO, Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY & SURVIVOR
BENEFIT PLAN; THE NFL PLAYER
DISABILITY & NEUROCOGNITIVE BENEFIT
PLAN; THE BERT BELL/PETE ROZELLE NFL
PLAYER RETIREMENT PLAN; THE
DISABILITY BOARD OF THE NFL PLAYER
DISABILITY & NEUROCOGNITIVE BENEFIT
PLAN; LARRY FERAZANI; JACOB FRANK;
BELINDA LERNER; SAM McCULLUM;
ROBERT SMITH; HOBY BRENNER; and
ROGER GOODELL,

Defendants.

Case No. 1:23-cv-00358-JRR

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION TO EXCLUDE**

Plaintiffs having filed a motion, pursuant to Rule 702 of the Federal Rules of Evidence (“FRE”), to exclude the Declaration of David B. Lasater in Support of Defendants’ Opposition to Plaintiffs’ Motion for Class Certification (ECF No. 111-2) (“Lasater Declaration”), the motion having been fully briefed, and the Court having considered the motion, the motion is hereby **GRANTED**.

The Court finds that the opinions set forth in the Lasater Declaration are not sufficiently reliable under the criteria prescribed by FRE 702 and, accordingly, the Court will not consider the

Lasater Declaration in rendering its ruling on Plaintiffs' motion for class certification (ECF No. 102).

IT IS SO ORDERED.

Dated this _____ day of _____, 2025

JULIE R. RUBIN
United States District Judge